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Attorneys for Creditor
TRINITY FINANCIAL SERVICES, LLC

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO

In re:

THOMAS J. CHEK,
Debtor,

Case No. 18-30006-DM

Chapter Number: 13

**SECURED CREDITOR TRINITY
FINANCIAL SERVICES, LLC'S JOINDER
TO TRUSTEE'S MOTION TO DISMISS
CASE PRIOR TO CONFIRMATION**

**Date: 05/16/18
Time: 1:10 p.m.
Ctrm: 17**

TO THE HONORABLE COURT AND ALL PARTIES IN INTEREST:

Secured creditor Trinity Financial Services, LLC ("Trinity") hereby JOINS in the relief requested by the Chapter 13 Trustee in the *Motion of Chapter 13 Trustee, David Burchard, to Dismiss Case Prior to Confirmation* [Docket No. 32] (the "Motion"). Trinity incorporates by reference its unresolved *Objection to First Amended Chapter 13 Plan* [Docket No. 23]. Trojan reserves the right to argue the applicable legal issues at the hearing on the Motion.


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1 Dated: May 1, 2018

Respectfully submitted,

2 BURKE, WILLIAMS & SORENSEN, LLP

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4 By: 
5 Richard J. Reynolds
6 Rafael R. Garcia-Salgado
7 Attorneys for Creditor
8 Trinity FINANCIAL SERVICES, LLC
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1 **PROOF OF SERVICE**

2 I, Johnnelle Gomez, am over the age of eighteen (18) years, and not a party to the within
3 action. My business address is 1851 East First Street, Suite 1550, Santa Ana, California 92705-
4 4067.

5 On **April 19, 2018**, I caused to be served a true and correct copy of **SECURED**
6 **CREDITOR TRINITY FINANCIAL SERVICES, LLC'S OBJECTION JOINDER WITH**
7 **TRUSTEE'S MOTION TO DISMISS CASE PRE-CONFIRMATION PURSUANT TO 11**
8 **U.S.C. Section 1307(c)** on the interested parties in this action by placing a true and correct copy
9 thereof enclosed in a sealed envelope with postage fully prepaid in the United States mail at Los
10 Angeles, California, **and/or** by NEF as addressed as follows:

11 **By NEF:**

- 12 • **David Burchard** TESTECF@burchardtrustee.com,
13 dburchard13@ecf.epiqsystems.com
14 • **Rafael Ramon Garcia-Salgado** rgarcia@bwsllaw.com, bantle@bwsllaw.com
15 • **Kelsey Luu** ecfcab@aldridgepate.com, kluu@ecf.inforuptcy.com
16 • **Russell Marne** russell@marne.com
• **Office of the U.S. Trustee / SF** USTPRegion17.SF.ECF@usdoj.gov
• **Richard J. Reynolds** rreynolds@bwsllaw.com, psoeffner@bwsllaw.com

17 **By Mail:**

18 **Thomas J. Chek**
19 900 Arlene Way
Novato, CA 94947-6905

20 **Hon. Dennis Montali - Chambers Copies**
21 U.S. Bankruptcy Judge
Mail Box 36099
22 San Francisco, CA 94102

23 I declare under penalty of perjury that the foregoing is true and correct.

24
25 Dated: **May 1, 2018**

/S/ Johnnelle Gomez
Johnnelle Gomez